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February 10, 2006

THE DEADLINE FOR THE
COMPLETION OF FACT DISCOVERY
IS EXTENDED TO 3-22-06.

VIA FACSIMILE

Hon. Henry B. Pitman, U.S.M.J.
Daniel J. Patrick Moynihan Courthouse
500 Pearl Street - Rm 750
New York, NY 10007-1312
Fax: (212) 805-6111

SO ORDERED

Henry Pitman
HENRY PITMAN
UNITED STATES MAGISTRATE JUDGE
2-14-06

Re: *Frontier Insurance et al v. Dwight Halvorson Insurance Services, et al*
SDNY 04 CV 3361(KMK)
Our File No. 3090.0001

Dear Judge Karas:

We represent defendants Dwight Halvorson Insurance Services ("DHIS") and Food Service Insurance Managers, Inc. ("FSIM") in the above-referenced matter. This matter was recently (2/9/06) referred to Your Honor by Judge Kenneth B. Karas for General Pretrial purposes.

We write to request a thirty (30) day extension of time to complete factual discovery to an including March 21, 2006. Plaintiff's counsel, Mr. William Gyves, has consented to this request.

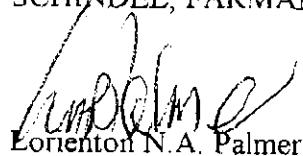
Broadly, this matter involves claims that premiums on about two hundred insurance policies issued in California and other western states are due and owing to plaintiff. As such, the discovery involves documents and witnesses in California and New York, as well as Bermuda. Presently, factual discovery is scheduled to close on February 20, 2006.

Hon. Hon. Henry B. Pitman, U.S.M.J.
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Attached is a copy of my earlier letter to Judge Karas. Since that letter, counsel have continued to work to resolve the issues and additional discovery has been produced. Presently, depositions are scheduled in California for the entire week, starting Monday February 13, 2006. As such, counsel will need to leave for California this weekend and will likely not return to New York until after the February 20, 2006 deadline. Additional depositions will need to be completed thereafter in New York.

In light of the above issues, and the February 20, 2006 factual discovery deadline, we request the Court's earliest attention to this request.

Respectfully,
SCHINDEL, FARMAN & LIPSIUS LLP



Lorionton N.A. Palmer

Via Facsimile

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FACSIMILE COVER SHEET

DATE: February 3, 2006

FROM: Lorienton N.A. Palmer, Esq.

TO: Hon. Kenneth Karas, U.S.D.J.
(212) 805-7968

cc: Attn: William S. Gyves, Esq
Michael McDonough, Esq.

FAX NO.: (212) 894.7272

RE: Frontier v. Dwight Halvorson Insurance Services, et al.
04 CV 3361 (KMK)
Our File 3090.0001

You should receive 3 pages including this cover sheet. If you do not receive all pages, please call (212) 563-1710, extension 241.

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February 3, 2006

VIA FACSIMILE

Hon. Kenneth M. Karas, U.S.D.J.
Daniel J. Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007-1312
Fax: (212) 805-7968

Re: *Frontier Insurance et al v. Dwight Halvorson Insurance Services, et al*
SDNY 04 CV 3361(KMK)
Our File No. 3090.0001

Dear Judge Karas:

We represent defendants Dwight Halvorson Insurance Services ("DHIS") and Food Service Insurance Managers, Inc. ("FSIM") in the above-referenced matter. This is to request an extension of time to complete factual discovery in this matter to March 21, 2006. I have spoken with Mr. William Gyves, counsel for plaintiff, and he does not object to this request.

Presently, factual discovery is scheduled to close on February 20, 2006. However, we are already experiencing scheduling difficulties.

Broadly, this matter involves claims that premiums on about two hundred insurance policies issued in California and other western states are due and owing to plaintiff. As such, the discovery involves documents and witnesses in California and New York, as well as Bermuda.

There is also a motion for partial summary judgment that is pending before the Court related to a portion of this case.

Defendants have provided discovery responses and in excess of 40,000 documents.

SCHINDEL, FARMAN & LIPSIOUS LLP

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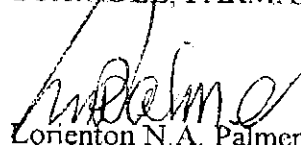
Supplementary responses are also being provided. Plaintiffs have provided discovery responses and documents. However from a recent discovery response, and in conversation with counsel, I understand there is a fair amount of documents still to be produced by plaintiff. This includes documents on which witnesses whose depositions have been scheduled or noticed will probably be questioned. The documents are located in Rock Hill New York, and we are currently working to do the review and/or production in the coming week of February 7.

Many of the witnesses involved in this matter - including nonparty witnesses- are in California and at least six depositions are being scheduled (both by subpoena and notice) for the week of February 14, 2006 including February 16.

We are also trying to coordinate for depositions of witnesses in New York however, in conversations with plaintiff's counsel it has become clear that and we will not be able to complete the factual discovery before the February 20, 2006 deadline. We also do not know yet if the additional documents or depositions will lead to additional discovery. Accordingly, we request an extension of time to complete factual discovery to March 21, 2006.

I have spoken with Mr. William Gyves, counsel for plaintiff and he does not object to this request.

Respectfully,
SCHINDEL, FARMAN & LIPSIOUS LLP



Lorinton N.A. Palmer

Via Facsimile

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